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Counsel to the Debtors and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

SUPPLEMENTAL DECLARATION OF REGINALD BROWN IN SUPPORT OF EMPLOYMENT OF WILMER CUTLER PICKERING HALE AND DORR LLP AS A PROFESSIONAL UTILIZED IN THE ORDINARY COURSE OF BUSINESS

(i) I am a partner of the firm Wilmer Cutler
Pickering Hale and Dorr LLP (the "Firm"), which has been
employed by the debtors and debtors in possession in the abovecaptioned cases (collectively the "Debtors") pursuant to the
Order Granting Debtors' Motion For Order Pursuant to Bankruptcy
Code Sections 105(a), 327, 330 and 331 Authorizing Debtors to

Employ Professionals Utilized in the Ordinary Course of Business [Docket No. 1279].

- (ii) In connection with such employment, I submitted a Declaration of Reginald Brown in Support of Employment of Wilmer Cutler Pickering Hale and Dorr LLP as a Professional Utilized in the Ordinary Course of Business, dated January 30, 2009 [Docket No. 1888] (the "Initial Declaration").
- (iii) In paragraph 1 of the Initial Declaration, I described the Firm's search in its records for the names of the interested parties set forth on the interested parties list provided to the Firm by the Debtors (the "Interested Parties List"). In that paragraph, I also disclosed potential connections of the Firm to a number of parties on the Interested Parties List.
- (iv) Since the date of the Initial Declaration, I have become aware that Bose Corporation, which was not on the Interested Parties List, is a potentially interested party in the Debtors' cases. Bose Corporation is, and may in the future be, a client of the firm in matters unrelated to the Firm's engagement by the Debtors, including matters related to the Debtors but unrelated to the Firm's engagement by the Debtors.

¹ In view of the large number of creditors that are scheduled as holding claims against the Debtors, and those that have filed claims, the Firm has limited its formal search of its client database to the list of potential parties in interest provided to it by the Debtors on the Interested Parties List at the outset of these cases. The Firm will nevertheless continue to supplement its disclosures as required to the extent it becomes aware of other connections to parties in interest in these cases.

WHEREFORE, declarant respectfully submits this Supplemental Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

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Executed on October $\frac{2\ell}{2}$, 2009.

Reginald Brown

a Partner

Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Avenue Washington, D.C. 20006